

HEARST

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Jonathan R. Donnellan
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April 12, 2022

Hon. Ronnie Abrams
U.S. District Court, Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

**Re: *In re Hearst Communications State Right of Publicity Statute Cases*,
No. 21-cv-08895-RA (S.D.N.Y.)**

Dear Judge Abrams:

We are counsel to Hearst Communications, Inc. (“Hearst”), the named Defendant in the above-referenced matter.

We write pursuant to Rule 4(g) of Your Honor’s Individual Rules & Practices in Civil Cases to indicate our availability for oral argument with respect to Hearst’s motion to dismiss this action pursuant to Fed. R. Civ. P. 12(b)(6) (ECF Nos. 37-38) should the Court deem it helpful. That motion is fully briefed as of the date of this letter with the filing of Hearst’s Reply Memorandum of Law.

Respectfully submitted,

/s/ **Jonathan R. Donnellan**
Jonathan R. Donnellan

cc: All counsel of record (by ECF)

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